



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

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## PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Doors Plus, Inc.  
1000 North Main Street  
Elkhart, Indiana 46514**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-17569-00172	
Issued by: Original signed by Paul Dubenetzky Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: February 27, 2004  Expiration Date: February 27, 2009

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates stationary wood manufacturing and surface coating operation.

Responsible Official:	General Manager
Source Address:	1000 North Main Street, Elkhart, Indiana 46514
Mailing Address:	1000 North Main Street, Elkhart, Indiana 46514
General Source Phone Number:	(574) 264-1230
SIC Code:	2499
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program
	Minor Source, under PSD Rules;
	Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) Two (2) surface coating spray booths identified as EU27 and EU28 (both constructed in 1995), each using air-assisted spray guns with a maximum coating capacity of 14.4 wood doors and 120.2 wood moldings per hour, both equipped with dry filters for particulate control, and exhausting through stacks SV-27 and SV-28, respectively.
- (b) One (1) surface coating spray machine, identified as EU24, using air-assisted airless spray guns, equipped with dry filters for particulate control, and exhausting through stack SV-26.
- (c) Two (2) continuous UV vacuum coating lines, identified as VA1 and VA2, with particulate emissions controlled by an internal return air baghouse.

### A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
  - (1) Woodworking operations identified as EU20 through EU23, and EU37, with particulate emissions controlled by three (3) separate baghouses and one (1) torit filter system, and exhausting through three (3) stacks identified as SV37, SV38, and SV40. [326 IAC 6-3-2]
  - (2) Sanding, priming, buffing, coating, and curing, equipped with a dust collection system for particulate control. [326 IAC 6-3-2]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## GENERAL CONDITIONS

## B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

#### B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

**B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]**

This permit does not convey any property rights of any sort or any exclusive privilege.

## B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, . IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.11 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;  
  
Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967  
Telephone No.: 574-245-4870 (Northern Regional Office)  
Facsimile No.: 574-245-4877
  - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

**B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

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- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

**B.14**    **Deviations from Permit Requirements and Conditions** [326 IAC 2-7-5(3)(C)(ii)]

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- (a)      Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b)      A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.15**    **Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

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- (a)      This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b)      This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1)      That this permit contains a material mistake.
- (2)      That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3)      That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c)      Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d)      The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.16**    **Permit Renewal** [326 IAC 2-7-4]

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- (a)      The application for renewal shall be submitted using the application form or forms

prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, , takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, , any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]  
[326 IAC 2-7-12 (b)(2)]

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

**B.20 Source Modification Requirement [326 IAC 2-7-10.5]**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

**B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2][IC 13-30-3-1]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source
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### Emission Limitations and Standards [326 IAC 2-7-5(1)]

**C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [40 CFR 52 Subpart P][326 IAC 6-3-2]**

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

**C.2 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

**C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

**C.6 Operation of Equipment [326 IAC 2-7-6(6)]**

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

**C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least

thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The

requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

## **Testing Requirements [326 IAC 2-7-6(1)]**

### **C.8 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

## **Compliance Requirements [326 IAC 2-1.1-11]**

### **C.9 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

## **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

### **C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality

100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

**C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

**C.12 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (  $\pm 2\%$  ) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature or flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (  $\pm 2\%$  ) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]**

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If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

**C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set

forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be 10 days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]**

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the

private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

**C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]**

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- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years.

**Stratospheric Ozone Protection**

**C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (a) Two (2) surface coating spray booths identified as EU27 and EU28 (both constructed in 1995), each using air-assisted spray guns with a maximum coating capacity of 14.4 wood doors and 120.2 wood moldings per hour, both equipped with dry filters for particulate control, and exhausting through stacks SV-27 and SV-28, respectively.
- (b) One (1) surface coating spray machine, identified as EU24, using air-assisted airless spray guns, equipped with dry filters for particulate control, and exhausting through stack SV-26.
- (c) Two (2) continuous UV vacuum coating lines, identified as VA1 and VA2, with particulate emissions controlled by an internal return air baghouse.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-2]

Pursuant to CP 039-2837-00172, issued on January 25, 1995, the total VOC input usage at the paint spray booths (EU24, EU27, and EU28) shall be limited to 96 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

#### D.1.2 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR Part 63, Subpart A] [Table 4 to 40 CFR Part 63, Subpart QQQQ] [40 CFR 63.4701]

- (a) The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 4 of 40 CFR Part 63, Subpart QQQQ. The Permittee must comply with these requirements on and after May 28, 2006.

- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.1.3 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products [40 CFR Part 63, Subpart QQQQ] [40 CFR 63.4683] [40 CFR 63.4681] [40 CFR 63.4781]

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- (a) The provisions of 40 CFR Part 63, Subpart QQQQ (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/wbldg/wbldgpg.html>. Pursuant to 40 CFR 63.4683(b), the Permittee must comply with these requirements on and after May 28, 2006.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart QQQQ:
- (1) Two (2) surface coating spray booths identified as EU27 and EU28 (both constructed in 1995), each using air-assisted spray guns with a maximum coating capacity of 14.4 wood doors and 120.2 wood moldings per hour, both equipped with dry filters for particulate control, and exhausting through stacks SV-27 and SV-28, respectively.
- (2) One (1) surface coating spray machine, identified as EU24, using air-assisted airless spray guns, equipped with dry filters for particulate control, and exhausting through stack SV-26.
- (d) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.4781, and are applicable to the affected source.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

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Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

Airless Spray Application  
Air Assisted Airless Spray Application  
Electrostatic Spray Application  
Electrostatic Bell or Disc Application  
Heated Airless Spray Application  
Roller Coating  
Brush or Wipe Application  
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

**D.1.5 Particulate Matter (PM) [40 CFR 52 Subpart P]**

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Pursuant to T039-7569-00172, issued on December 31, 1998 and [40 CFR 52 Subpart P], the PM from the paint spray booths (EU24, EU27, and EU28) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

**D.1.6 Particulate [326 IAC 6-3-2(d)]**

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Pursuant to 326 IAC 6-3-2(d), particulate from the paint spray booths (EU24, EU27, and EU28) shall be controlled by air filters, and the Permittee shall operate the control devices in accordance with manufacturer's specifications.

**D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

**Compliance Determination Requirements**

**D.1.8 Volatile Organic Compounds (VOC)**

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Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.1.9 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the air filters, weekly observations shall be made of the overspray from the spray booths (EU24, EU27, EU28, VA1, and VA2) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### **D.1.10 Notification Requirements [40 CFR 63.4710]**

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- (a) General. The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to you by the dates specified in those sections, except as provided in 40 CFR 63.4710, paragraphs (b) and (c).
- (b) Initial notification. The Permittee submitted the initial notification required by 40 CFR 63.9(b) on September 25, 2003.
- (c) Notification of compliance status. The Permittee must submit the notification of compliance status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.4740, 40 CFR 63.4750, or 40 CFR 63.4760 that applies to your affected source. The notification of compliance status must contain the information specified in 40 CFR 63.4710, paragraphs (c)(1) through (9) and in 40 CFR 63.9(h).

##### **D.1.11 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12] [326 IAC 2-7-5]**

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— The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart QQQQ, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than twenty-seven months after the effective date of 40 CFR 63, Subpart QQQQ.
- (c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

##### **D.1.12 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The amount of coating material and solvent less water used on monthly basis.

- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (2) The cleanup solvent usage for each month;
- (3) The total VOC usage for each month; and
- (4) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (1) Woodworking operations identified as EU20 through EU23, and EU37, with particulate emissions controlled by three (3) separate baghouses and one (1) torit filter system, and exhausting through three (3) stacks identified as SV37, SV38, and SV40. [326 IAC 6-3-2]
- (2) Sanding, priming, buffing, coating, and curing, equipped with a dust collection system for particulate control. [326 IAC 6-3-2]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies), the allowable particulate emission rate from the woodworking operations identified as EU20 through EU23, and EU37 shall not exceed 0.87 pounds per hour when operating at a process weight rate of 200 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

#### D.2.2 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(e), the allowable particulate emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour. This includes the following operations:

Sanding, priming, buffing, coating, and curing, equipped with a dust collection system for particulate control.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Doors Plus, Inc.  
Source Address: 1000 North Main Street, Elkhart, Indiana 46514  
Mailing Address: 1000 North Main Street, Elkhart, Indiana 46514  
Part 70 Permit No.: T039-17569-00172

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

? Annual Compliance Certification Letter

? Test Result (specify) \_\_\_\_\_

? Report (specify) \_\_\_\_\_

? Notification (specify) \_\_\_\_\_

? Affidavit (specify) \_\_\_\_\_

? Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**COMPLIANCE BRANCH**  
**100 North Senate Avenue**  
**P.O. Box 6015**  
**Indianapolis, Indiana 46206-6015**  
**Phone: 317-233-5674**  
**Fax: 317-233-5967**

**PART 70 OPERATING PERMIT**  
**EMERGENCY OCCURRENCE REPORT**

Source Name: Doors Plus, Inc.  
Source Address: 1000 North Main Street, Elkhart, Indiana 46514  
Mailing Address: 1000 North Main Street, Elkhart, Indiana 46514  
Part 70 Permit No.: T039-17569-00172

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p>? This is an emergency as defined in 326 IAC 2-7-1(12)</p> <p>? The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and</p> <p>? The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.</p> |
|--|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Doors Plus, Inc.  
Source Address: 1000 North Main Street, Elkhart, Indiana 46514  
Mailing Address: 1000 North Main Street, Elkhart, Indiana 46514  
Part 70 Permit No.: T039-17569-00172  
Facility: Paint Spray Booths (EU24, EU27 and EU28)  
Parameter: VOC  
Limit: 96.0 tons of VOC per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage This Month	VOC Usage Previous 11 Months	12 Month Total VOC Usage
Month 1			
Month 2			
Month 3			

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Doors Plus, Inc.  
Source Address: 1000 North Main Street, Elkhart, Indiana 46514  
Mailing Address: 1000 North Main Street, Elkhart, Indiana 46514  
Part 70 Permit No.: T039-17569-00172

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

? NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

? THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management  
Office of Air Quality**

**Addendum to the  
Technical Support Document (TSD) for a Part 70 Operating Permit Renewal**

**Source Background and Description**

**Source Name:** Doors Plus, Inc.  
**Source Location:** 1000 North Main Street, Elkhart, IN 46514  
**County:** Elkhart  
**SIC Code:** 2499  
**Operation Permit No.:** T039-17569-00172  
**Permit Reviewer:** Adeel Yousuf / EVP

On December 23, 2003, the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth in Elkhart, Indiana, stating that Doors Plus, Inc. had applied for a Part 70 Operating Permit Renewal for the operation of a wood manufacturing and surface coating operation. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit Renewal for this operation and provided information on how the public could review the proposed Part 70 Operating Permit Renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit Renewal should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the Part 70 Operating Permit Renewal. Bolded language has been added and the language with a line through it has been deleted.

Conditions C.8, C.13 and C.18 have been updated to change “source” to “Permittee”.

**C.8 Performance Testing [326 IAC 3-6]**

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- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the ~~source~~ **Permittee** submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

**C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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If a regulated substance as defined in is present at a source in more than a threshold quantity, the ~~source~~ **Permittee** must comply with the applicable requirements of 40 CFR 68.

**C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The ~~source~~ **Permittee** shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the “authorized individual” as defined by 326 IAC2-1.1-1(1).

## **Indiana Department of Environmental Management Office of Air Quality**

### **Technical Support Document (TSD) for a Part 70 Operating Permit Renewal**

#### **Source Background and Description**

**Source Name:** Doors Plus, Inc.  
**Source Location:** 1000 North Main Street, Elkhart, IN 46514  
**County:** Elkhart  
**SIC Code:** 2499  
**Operation Permit No.:** T039-17569-00172  
**Permit Reviewer:** Adeel Yousuf / EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 permit renewal application from Doors Plus, Inc. relating to the operation of a wood manufacturing and surface coating operation.

#### **Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) Two (2) surface coating spray booths identified as EU27 and EU28 (both constructed in 1995), each using air-assisted spray guns with a maximum coating capacity of 14.4 wood doors and 120.2 wood moldings per hour, both equipped with dry filters for particulate control, and exhausting through stacks SV-27 and SV-28, respectively.
- (b) One (1) surface coating spray machine, identified as EU24, using air-assisted airless spray guns, equipped with dry filters for particulate control, and exhausting through stack SV-26.
- (c) Two (2) continuous UV vacuum coating lines, identified as VA1 and VA2, with particulate emissions controlled by an internal return air baghouse.

#### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
  - (1) Woodworking operations identified as EU20 through EU23, and EU37, with particulate emissions controlled by three (3) separate baghouses and one (1) torit filter system, and exhausting through three (3) stacks identified as SV37, SV38, and SV40. [326 IAC 6-3-2]
  - (2) Sanding, priming, buffing, coating, and curing, equipped with a dust collection

system for particulate control. [326 IAC 6-3-2]

- (b) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
- (c) Water based adhesives that are less than or equal to 5% by volume of VOC's excluding HAPs.
- (d) Paved and unpaved roads and parking lots with public access.
- (e) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.
- (f) One (1) stain mixing room that exhausts to side vent SV-39.
- (g) One (1) 7 gallon covered reclaimer system that exhausts to side vent SV-41.

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Part 70 operating permit 039-7569-00172, issued on December 31, 1998.
- (b) First Minor Permit Modification 039-11956-00172, issued on July 6, 2000.
- (c) Second Minor Permit Modification 039-14224-00172, issued on August 24, 2001.
- (d) First Reopening No. 039-13224-00172, issued on December 18, 2001.
- (e) First Significant Permit Modification 039-15516-00172, issued on August 6, 2002.
- (f) First Administrative Amendment 039-17140-00172, issued on April 29, 2003.

All conditions from previous approvals were incorporated into this Title V renewal except the following:

- (a) Part 70 operating permit 039-7569-00172, issued on December 31, 1998.

1. Conditions: D.2.2, D.2.4 through D.2.8

Wood working operation (EU20 through EU23, and EU37)

D.2.2 Preventive Maintenance Plan

D.2.4 Particulate Matter (PM)

D.2.5 Visible Emissions Notations

D.2.6 Baghouse Inspections

D.2.7 Broken or Failed Bag Detection

D.2.8 Record Keeping Requirements

Reason not incorporated: Woodworking operations (EU20 through EU23, and EU37) were permitted as significant activities in the Part 70 operating permit 039-7569-00172, issued on December 31, 1998. However, during this Part 70 renewal permit review, these units with potential PM and PM-10 emissions less than 5 pounds per hour and with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, are determined to be insignificant activities. Compliance monitoring requirements do not apply to these controlled facilities where allowable PM emission rates are well below 10 pounds per hour.

2. Conditions: D.3.4 through D.3.7, and D.3.9

Sanding, priming, coating, and curing operation, associated with the UV Vacuum coating lines.

- D.3.4 Particulate Matter (PM)
- D.3.5 Visible Emissions Notations
- D.3.6 Baghouse Inspections
- D.3.7 Broken or Failed Bag Detection
- D.3.9 Record Keeping Requirements

Reason not incorporated: Sanding, priming, coating, and curing operation, associated with the UV Vacuum coating lines was permitted as significant activity in the Part 70 operating permit 039-7569-00172, issued on December 31, 1998. However, during this Part 70 renewal permit review, this operation with potential PM and PM-10 emissions less than 5 pounds per hour, and with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and flow rate less than or equal to 4000 actual cubic feet per minute, is determined to be insignificant activity. Compliance monitoring requirements do not apply to this controlled facility where allowable PM emission rate is well below 10 pounds per hour.

3. Condition: D.1.2

Surface coating spray booths EU24, EU27, and EU28.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP-039-2837-00172, issued on January 27, 1995, the spray booths shall use no more than 8 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per month. This usage limit is required to limit the potential to emit of VOC to less than 96 tons of VOC per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration), 326 IAC 2-3 (Emission Offset) not applicable.

The above condition in the original Title V permit has been revised to following:

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-2]

Pursuant to CP 039-2837-00172, issued on January 27, 1995, the total VOC input usage at the paint spray booths (EU24, EU27, and EU28) shall be limited to 96 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

Reason for change: The monthly VOC usage limit of 8 tons per year for the spray booths EU24, EU27, and EU28 has been combined into one annual limit of 96 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

#### **Enforcement Issue**

There are no enforcement actions pending.

#### **Recommendation**

The staff recommends to the Commissioner that the Part 70 permit renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on April 2, 2003.

There was no notice of completeness letter mailed to the source.

#### **Emission Calculations**

See Appendix A of this document for detailed emissions calculations (four (4) pages).

#### **Potential to Emit of the Source**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

The source was issued a Part 70 Operating Permit (039-7569-00172) on December 31, 1998. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the original Part 70 operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Surface Coating Operation (EU24, EU27, EU28, VA1, and VA2)	0.02	0.02	--	96.00	--	--	12.79 (single) 31.26 (total)

Insignificant Woodworking Operation	0.06	0.06	--	--	--	--	--
Total Emissions	0.08	0.08	--	96.00	--	--	12.79 (single) 31.26 (total)

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the unrestricted potential emissions (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	3.0
PM-10	3.0
SO <sub>2</sub>	0.0
VOC	63.0
CO	0.0
NO <sub>x</sub>	1.0
HAP	not reported

### County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Elkhart County has been classified as attainment or unclassifiable for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of

Significant Deterioration (PSD), 326 IAC 2-2.

- (c) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

### Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) The wood surface coating operation at this source is not subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20, (40 CFR 63, Subpart JJ). Subpart JJ, as per 40 CFR 63.801 (*Definitions*), applies to wood furniture manufacturing operations under any following standard industrial classification codes: 2434, 2511, 2512, 2517, 2519, 2521, 2531, 2541, 2599, or 5712. Since this source engages in manufacturing of wood doors and door moldings and operates under the non listed SIC code of 2499, the requirements of this rule do not apply to this source.
- (c) This source is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Surface Coating of Wood Building Products, 40 CFR 63.4680-63.4781 (Subpart QQQQ), and 326 IAC 20-1-1, because it conducts surface coating of wood building products (i.e., doors, finished doorskins, and door components); it is a major source of hazardous air pollutants; and it uses 1,100 gallons per year or more of coatings. Pursuant to §63.4682(c), since this source commenced construction before June 21, 2002, this source is not considered as a new affected source. Therefore, this is an existing affected source [§63.4682(e)], whose Subpart QQQQ compliance date is May 28, 2006 [§63.4683(b)].

Since the compliance date of the rule has not passed and the Permittee has not chosen the method of compliance with Subpart QQQQ, the detailed requirements of the NESHAP will not be included in this approval. Rather, this permit will state that the collection of all affected activities and equipment at this source, including but not necessarily limited to surface coating booths EU24, EU27 and EU28 are subject to the requirements of 40 CFR 63, Subpart QQQQ and will require the Permittee to comply with those requirements as they exist on May 28, 2006, the compliance date for this existing affected source. This approval will also include a condition requiring the Permittee to incorporate the

requirements of Subpart QQQQ into the Part 70 permit by doing one of the following:

- (A) apply for a Significant Permit Modification when the Compliant Material Option of §63.4740, §63.4740, or §63.4740 has been determined by the Permittee for this source; or
- (B) include detailed information regarding Subpart QQQQ in the Part 70 permit renewal application to be submitted to IDEM, OAQ, pursuant to Condition B.18.

In no case shall information be submitted to IDEM any later than 270 days prior to the Subpart QQQQ compliance date of May 28, 2006. The initial notification requirements pursuant to §63.4710(b) are satisfied by the application to approve this Part 70 Permit renewal, pursuant to §63.9(b).

- (d) Prior to the final promulgation of Subpart QQQQ on May 28, 2003, the requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) were applicable to this source. The Permittee submitted the requisite Part 1 MACT Application on May 6, 2002, prior to the May 15, 2002 reporting deadline. Notwithstanding the Part 1 application, the Permittee is required to comply with an applicable MACT standard that is promulgated prior to the Section 112(j) MACT deadline for a Part 2 MACT application [40 CFR 63.52(a)]. Since such deadline has not occurred, the Section 112(j) requirements no longer apply to this source and are instead replaced by the requirements of 40 CFR 63, Subpart QQQQ.
- (e) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this modification. Such requirements apply to a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, at a major source that is required to obtain a Part 70 or 71 permit if the PSEU meets the following criteria:
  - (1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant,
  - (2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and
  - (3) the unit has a potential to emit (PTE) before controls equal to or greater than 100 percent of the amount (tons per year) of the pollutant required for a source to classified as a Part 70 major source.

This source was issued Part 70 permit No. 039-7569-00172 on December 31, 1998.

The existing PSEUs each have respective uncontrolled PTEs at less than 100 percent of the applicable major Part 70 thresholds. Additionally, the existing PSEUs do not use a control device to comply with applicable requirements. As such, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this modification and the proposed PSEUs.

#### **State Rule Applicability - Entire Source**

##### **326 IAC 1-5-2 (Emergency Reduction Plan)**

This source is not subject to 326 IAC 1-5-2 (Emergency Reduction Plan), because the source does not have the potential to emit any criteria pollutant at or above 100 tons per year.

**326 IAC 2-2 (Prevention of Significant Deterioration, PSD)**

This source, constructed in 1995, after the applicability date of August 7, 1980, is not considered a major source because it does not belong to one of the 28 listed source categories, the uncontrolled potential to emit of CO, SO<sub>2</sub>, PM, VOC and NO<sub>x</sub> are less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (PSD) do not apply.

Pursuant to T039-7569-00172, issued on December 31, 1998, the total VOC input usage at the paint spray booths (EU24, EU27, and EU28) shall be limited to 96 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration).

**326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Elkhart County and has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

**326 IAC 5-1 (Opacity Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**326 IAC 6-4 (Fugitive Dust Emissions)**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

**326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)**

This source is not subject to 326 IAC 6-5, for fugitive particulate matter emissions, because the fugitive particulate matter emissions from this source are less than 25 tons per year.

**State Rule Applicability - Individual Facilities**

**326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))**

This source is not subject to this rule. This rule applies to major sources of hazardous air pollutants (HAP) that were constructed or reconstructed after July 27, 1997. All the facilities at this source were constructed in 1995, therefore, 326 IAC 2-4.1 does not apply.

**326 IAC 6-3-2 (Process Operations)**

On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirement from the

previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to T039-7569-00172, issued on December 31, 1998 and [40 CFR 52 Subpart P], the particulate matter emissions from the surface coating facilities (EU24, EU27, EU28, VA1, and VA2) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating facilities (EU24, EU27, EU28, VA1, and VA2) shall be controlled by a dry particulate filter, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

#### 326 IAC 8-1-6 (New Facilities)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more and are not subject to other provisions of Article 8. This source has a wood surface coating operation (identified as EU24, EU27, and EU28) that is constructed after January 1, 1980, with potential uncontrolled VOC emissions in excess of 25 tons per year. However, the surface coating operations at this source are subject to the requirements of 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), therefore, this rule does not apply.

#### 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

This source is subject to 326 IAC 8-2-12 for each of spray booths (EU24, EU27, and EU28), because they are constructed after 1990, and have the potential to emit more than 15 pounds per day of VOC. Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets at booths EU24, EU27, and EU28 shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system. Doors Plus, Inc. uses air assisted airless spray applications, therefore, this source is in compliance with 326 IAC 8-2-12.

#### 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

The particulate from the woodworking operation shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

$$E = 4.10 * (0.1)^{0.67} = 0.87 \text{ lbs PM/hour}$$

Based on the above equation, particulate emissions from the woodworking operation shall be limited to 0.87 pounds per hour.

Compliance calculation:

$$(0.06 \text{ tons PM/yr}) * (\text{yr}/8,760 \text{ hrs}) * (2,000 \text{ lbs/ton}) = 0.0137 \text{ lbs PM/hr}$$

Actual lbs PM/hr (0.0137) is less than the allowable lbs PM/hr (0.87), therefore the woodworking operation will comply with the requirements of 326 IAC 6-3-2.

The baghouses shall be in operation at all times the wood working operation is in operation, in order to comply with this limit.

**326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)**

The Grinding and Machining operations handles less than 100 pounds of material per hour.

Pursuant to 326 IAC 6-3-2(e)(2), allowable particulate emissions from these units shall not exceed 0.551 pounds per hour.

**326 IAC 8-6 (Organic Solvent Emission Limitations)**

This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential solvent VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source was constructed after January 1, 1980. Therefore, this rule does not apply to this source.

**326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)**

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. The source is located in Elkhart County. Therefore, this rule is not applicable to this source.

**326 IAC 8-11 (Wood Furniture Coatings)**

This rule applies to any person performing wood furniture manufacturing operations in Lake, Porter, Clark, or Floyd County, with the wood furniture manufacturing operations having potential emissions of VOC of 25 tons or more per year and occurring at a source classified with a listed Standard Industrial Classification (SIC) code. This rule is not applicable to this source since it is located in Elkhart County.

There are no other 326 IAC 8 rules that apply.

**Testing Requirements**

Compliance testing is not required for this source since the coating material usage and related VOC and volatile organic HAP emissions assume an emission factor of 2,000 pounds of pollutant emitted per ton of pollutant input to the coating operation, and the woodworking operations are controlled by three (3) baghouses with emissions after control well below the allowable particulate matter emission rate.

**Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The spray paint booths (EU24, EU27, EU28, VA1, and VA2) have applicable compliance monitoring conditions as specified below:
  - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray paint booths (EU24, EU27, EU28, VA1 and VA2) while the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
  - (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.
  - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the spray paint booths must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

## Conclusion

The operation of this wood manufacturing and surface coating operation shall be subject to the conditions of the attached proposed Part 70 Permit No. T039-17569-00172.

## Appendix A: Emission Calculations

**Company Name:** Doors Plus, Inc.  
**Address City IN Zip:** 1000 North Main Street, Elkhart, IN 46514  
**Permit No.:** T039-17569-00172  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** September 17, 2003

Uncontrolled Potential Emissions (tons/year)			
Emissions Generating Activity			
Pollutant	Surface Coating	Wood Working	TOTAL
PM	52.96	5.80	58.76
PM10	52.96	5.80	58.76
SO2	0.00	0.00	0.00
NOx	0.00	0.00	0.00
VOC	229.91	0.00	229.91
CO	0.00	0.00	0.00
total HAPs	31.26	0.00	31.26
worst case single HAP	(Xylene) 12.79	0.00	(Xylene) 12.79
Total emissions based on rated capacity at 8,760 hours/year.			
Controlled Potential Emissions (tons/year)			
Emissions Generating Activity			
Pollutant	Surface Coating	Wood Working	TOTAL
PM	0.02	0.06	0.08
PM10	0.02	0.06	0.08
SO2	0.00	0.00	0.00
NOx	0.00	0.00	0.00
VOC	96.00	0.00	96.00
CO	0.00	0.00	0.00
total HAPs	13.05	0.00	13.05
worst case single HAP	(Xylene) 5.34	0.00	(Xylene) 5.34

Total emissions based on rated capacity at 8,760 hours/year, after control.

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

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**Company Name:** Doors Plus, Inc.  
**Address City IN Zip:** 1000 North Main Street, Elkhart, IN 46514  
**Permit No.:** T039-17569-00172  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** September 17, 2003

Booth ID	Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
EU24	Stain Base	6.62	99.50%	0.0%	99.5%	0.0%	0.050%	1.00000	1.000	6.59	6.59	6.59	158.09	28.85	0.07	13173.80	50%
EU24	Paint Base SS-0205	8.96	60.00%	0.0%	60.0%	0.0%	40.00%	1.00000	1.000	5.38	5.38	5.38	129.02	23.55	7.85	13.44	50%
EU27	Stain Base (S-1657)	6.07	100.00%	0.0%	100.0%	0.0%	0.00%	0.12500	14.400	6.07	6.07	10.93	262.22	47.86	0.00	#DIV/0!	50%
EU27	Vanish Sealer (V81FH11)	7.61	70.00%	0.0%	70.0%	0.0%	30.00%	0.12500	14.400	5.33	5.33	9.59	230.13	42.00	9.00	17.76	50%
EU28	Paint (T77XXW7599)	8.96	59.00%	0.0%	59.0%	0.0%	41.00%	0.12500	14.400	5.29	5.29	9.52	228.37	41.68	14.48	12.89	50%
EU28	Topcoat (HC 30 Sheen)	7.85	67.00%	0.0%	67.0%	0.0%	33.00%	0.12500	14.400	5.26	5.26	9.47	227.21	41.47	10.21	15.94	50%
EU28	Topcoat Cat (M59c0037)	7.21	60.00%	0.0%	79.5%	0.0%	19.50%	0.01250	14.400	5.73	5.73	1.03	24.76	4.52	1.14	29.39	50%

<b>State Potential Emissions</b>	<b>Add worst case coating to all solvents</b>	<b>52.49</b>	<b>1259.80</b>	<b>229.91</b>	<b>42.75</b>
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Controlled Potential Emissions						
Total Controlled Potential Emissions:	Material Usage Limitation	Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year
		VOC	PM			
		41.75%	0.00%	99.90%	21.92	525.97
					95.99	0.02

Based on the information provided by the source, the two (2) continuous UV vacuum coating lines, identified as VA1 and VA2 have negligible particulate and VOC emissions.

Overspray from these units is captured and controlled inside the spray machine EU24.

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Total = Sum of worst case coatings in each booth

# Appendix A: PM Emission Calculations for Woodworking

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**Company Name:** Doors Plus, Inc.  
**Address City IN Zip:** 1000 North Main Street, Elkhart, IN 46514  
**Permit No.:** T039-17569-00172  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** September 17, 2003

Emission Unit ID	Outlet Grain Loading (gr/acf)	Flow Rate acf/min	PM Control Efficiency (%)	Potential PM Emission Rate			Allowable PM Emission Process Weight Rate (lb/hr)
				Before Controls (tons/yr)	After Control (tons/yr)	After Control (lb/hr)	
SV37	0.0000198	3600	99.0%	0.268	0.003	0.0006	200.0
SV38	0.00045	2000	99.0%	3.379	0.034	0.0077	
SV40	0.000159	3600	99.0%	2.149	0.021	0.0049	
	<b>Total PM Emission Rate:</b>			5.80	0.06		

Methodology:

Potential emissions before controls (tons/yr) = (gr / acf) (lb / 7000 gr) (acf / min) (60 min / hr) (8760 hr / yr) (ton / 2000 lb) / (1 - efficiency)

Potential emissions after controls (tons/yr) = Potential Emissions before Control \* (1 - efficiency)

All particulate matter is assumed equal to PM-10.